

Exhibit A

AHC of Supporting Counsel Members

Law Firm	Address	Number of Claims Represented
De la Rosa Law Firm	Oscar de la Rosa 850 Northwest 42nd Avenue #205 Miami FL, 33126	251
Ferrer Poirot & Wansbrough	Jesse Ferrer 2603 Oak Lawn Avenue Suite 300 Dallas, Texas 75219	107

Exhibit B-1

De la Rosa Law Firm Claims

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit B-1 – De la Rosa Law Firm - Redacted Claimant Schedule

Page 1 of 7

EXHIBIT B-1		DE LA ROSA LAW FIRM		REDACTED VERSION	
First Name (injured Person)	Last Name (injured Person)	DOB	SSN (Last 4)	Date of Death	Claim Type
Carol	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carol	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Jamila	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Roxanna	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Diana	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Amy	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Melissa	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Zayda	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Anne Marie	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Connie Asher	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Martha	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Karla Diane	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Pamela	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Linda	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sherri	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Faucet	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Rhonda	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ginger	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Melissa Marie	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Michelle	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Karen Ann	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Lucie	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carol	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Betty	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Toni	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Silvia	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Daphne	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Charlotte	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Stephanie	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Juanita	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Madeline	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Judith	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Judy	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kaelyn	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Diana	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Theresa	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Francine Marie	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carolyn	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Laura	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Donna	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit B-1 – De la Rosa Law Firm - Redacted Claimant Schedule

Page 2 of 7

EXHIBIT B-1		DE LA ROSA LAW FIRM		REDACTED VERSION	
First Name (injured Person)	Last Name (injured Person)	DOB	SSN (Last 4)	Date of Death	Claim Type
Margie	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Eleanor	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Helen Barbara	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sarah Jean	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Pamela	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sandra Lee	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Marie Grace	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Celeste	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Irma	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Fidelia	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Audrey	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Deshana	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Joann	E.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Dorothy Mary	E.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Pamela	E.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Uila	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sandra Faye	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sheila Cristina	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Alejandra	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Teresita	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Tammy	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Eliasar	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Leslie	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Karen	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Martha	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cynthia Anna	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Barbara	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Denise	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Charles	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Joanne	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Gloria	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
William	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Doreen	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cristina	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Helen	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Gladys	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sharyn	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Jeanie Ann	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Lisa Marie	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Dennis	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit B-1 – De la Rosa Law Firm - Redacted Claimant Schedule

Page 3 of 7

EXHIBIT B-1		DE LA ROSA LAW FIRM		REDACTED VERSION	
First Name (injured Person)	Last Name (injured Person)	DOB	SSN (Last 4)	Date of Death	Claim Type
Janet	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Lee	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Leah	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Frances	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Janet	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Penny	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Traci	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Becky	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mary	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Phillis	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cindy Jo	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carol	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Jacqueline	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Joi	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Hattie	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Lenora Louise	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ethel	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Edna	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carol	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Dana	I.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Linda	I.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Brown	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Merry Alice	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mary	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Clarice	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Marlene	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Inez	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Linda	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Vicky	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Patricia Ann	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Minor-Rowan	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Janice	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Joyce Dianne	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Deborah	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kathleen	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Victoria Lynn	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sandra	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Theresa	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Victoria	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Patricia	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit B-1 – De la Rosa Law Firm - Redacted Claimant Schedule

Page 4 of 7

EXHIBIT B-1		DE LA ROSA LAW FIRM		REDACTED VERSION	
First Name (injured Person)	Last Name (injured Person)	DOB	SSN (Last 4)	Date of Death	Claim Type
Marie Christine	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Deborah	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Karol	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ruby	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Jacqueline	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Pam	K.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Joan	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Hortencia	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Laura Imelda	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Daphne	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Regina Lyn	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Victoria	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sharon	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Susan	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kathleen	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Georgia	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Rebecca Faye	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Debbie June	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Martha	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Lynn	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Honey	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Terra Ann	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Naomi	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Tonya	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Teresa Michele	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Louise	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Linda	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Karen	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cheryl	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Karen	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mary Catherine	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sarah	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Maria	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ruth	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kerri	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Brenda	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Beth	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Elona	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Gertrude	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Patsy	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit B-1 – De la Rosa Law Firm - Redacted Claimant Schedule

Page 5 of 7

EXHIBIT B-1		DE LA ROSA LAW FIRM		REDACTED VERSION	
First Name (injured Person)	Last Name (injured Person)	DOB	SSN (Last 4)	Date of Death	Claim Type
Karen	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Patricia Ann	N.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
James	N.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Helen	O.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kathy	O.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Melody	O.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Jeannine	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Donna	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Saundra	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mercy	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Helen	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Grace	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Doris	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kelly	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Tammy	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Marjorie	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kathleen	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Linda Kay	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Patricia	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Gatha	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Judith	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Dhanmattie	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
George	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Shirley	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kelley	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Daniel	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kathie	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Donna	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Debra	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Karen	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Irma	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Zenaida	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Anna	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Maria	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Rachel	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carolyn	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Donna	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Robert	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Catherine	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Chyrel	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit B-1 – De la Rosa Law Firm - Redacted Claimant Schedule

Page 6 of 7

EXHIBIT B-1		DE LA ROSA LAW FIRM		REDACTED VERSION	
First Name (injured Person)	Last Name (injured Person)	DOB	SSN (Last 4)	Date of Death	Claim Type
Eleanor Jacqueline	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Christa Lynn	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Danelle	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Patricia	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Pamela	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sharon	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Darlene	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Janice	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Janelle	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Alvin	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Violet Ann	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Virginia	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Nevada	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Debra Marie	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Melissa	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Catherine	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Concetta	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Patricia	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Thelma	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Eve Marie	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Michael	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Tikira	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Nancy	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Corrine	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Vanila Lynn	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Beverly	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Deborah	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cynthia	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Trenna	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Janet	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Vy	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kristen	V.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Joanna	V.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Glenda	V.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Annie	V.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Peggy	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Barbara Jean	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Gisela	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mary	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Brad	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit B-1 – De la Rosa Law Firm - Redacted Claimant Schedule

Page 7 of 7

EXHIBIT B-1		DE LA ROSA LAW FIRM		REDACTED VERSION	
First Name (injured Person)	Last Name (injured Person)	DOB	SSN (Last 4)	Date of Death	Claim Type
Janise	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Leslie	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Traci Lynette	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ernest Edward	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Corinna	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Gracie	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Leslie	Y.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Rose	Z.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ivette	Z.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Toni Hector	Z.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Kathleen	Z.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Exhibit B-2

De la Rosa Law Firm Retainer Agreement



Attorney Representation Agreement
Re: Talcum Powder Liability Litigation / Cancer

This agreement is between _____
(hereinafter, collectively "Client") and De la Rosa Law, P.A (hereinafter "Attorneys").

By signing below, _____ represents that he/she has the authority to enter
into this agreement on behalf of _____

This agreement is intended to bind all heirs, death beneficiaries, and estate representatives of
Client in the event of a death.

Scope of Representation. Client hires Attorneys to represent Client in investigating and, if
appropriate, pursuing a potential claim for injuries and damages caused by the use and
application of talcum powder products (the "Claims"). Attorneys shall have the right to
withdraw and cancel this Agreement within six months of its execution if they are unable or
unwilling to undertake the representation for any reason. Attorneys will use their best effort
and skill in pursuing this case but do not guarantee a specific result. Client acknowledges that
this Agreement is limited to the sole purpose expressly stated in this Agreement.

Authority of Attorneys. Client authorizes Attorneys to pursue recovery as Attorneys deem
necessary, including through arbitration, mediation, and litigation. Client appoints Attorneys
to perform any acts that in their judgement may be reasonable and necessary in the handling
of the case, including hiring investigators or expert witnesses and obtaining medical records.
Client agrees that Attorneys may associate additional lawyers/firms to represent Client in this
matter, and Client agrees to the sharing of fees between lawyers. The terms herein apply to
other lawyers associated on this case. Association of other lawyers or law firms will not
increase the amount of the attorney fees paid by Client upon a successful resolution.

_____. Client will only owe a legal fee if Attorneys successfully collect
compensation on Client's behalf. **If Attorneys are unable to collect anything on Client's
behalf, Client will owe nothing.**

If Attorneys obtain settlement or judgement for Client, Client will pay _____
_____ of the gross recovery, before reimbursement of expenses. The fee set forth in
this Agreement is not set by law but is negotiable prior to signing the Agreement. Attorneys'
compensation will not exceed any limits on compensation imposed by law.

Litigation Costs and Expenses: Attorney shall advance such costs, including case specific
and general costs, as in their judgement are necessary for the prosecution of these claims and
costs advanced by Attorney shall be payable out of any recovery in the case. These costs may
include, but will not be limited to, case specific costs of medical evaluations, costs of
obtaining medical records, copying costs, postage, telephone and facsimile transmission
charges, messenger and delivery charges, travel expenses, court costs and filing fees, process
serving fees, investigators' fees, product investigation and testing fees, word and data
processing charges, expert and



If Client fails to comply with any of the responsibilities contained in this Section, Attorneys may dismiss any claim that they have filed on Client's behalf, or in Attorneys' discretion, withdraw from representing Client, and Client agrees to not oppose any such motion to withdraw filed in a legal proceeding.

Conflict and Settlement. Client understands that Attorneys are representing multiple plaintiffs with similar claims. Client consents to such representation and waives any potential conflict that might arise from such representation. For example, Client recognizes and agrees that the parties may reach a global settlement of multiple related Talcum Powder Products liability cases. **Client will have the final decision whether to accept any proposed settlement.** The decision to settle or resolve an individual case is exclusively held by Client. Client agrees that he or she will not make a settlement demand or offer of settlement without the consent of Attorneys. Attorneys may, in their discretion, terminate representation of Client if, in their opinion, the Client has unreasonably withheld consent to a fair and reasonable settlement proposal.

Termination of this Agreement. If this Agreement is terminated before the case is resolved, Client gives Attorneys a lien against any subsequent recovery in this case for Attorneys' time and expenses. If an offer has been negotiated, Attorneys will have a lien upon any subsequent recovery equal [REDACTED] or an amount to compensate for time and expenses, whichever is greater. Client may terminate Attorneys' representation of Client at any time by providing written notice to Attorneys at the address of their principal office. Attorneys may withdraw from representation of Client at any time if they determine prosecution of the claim is not practicable.

Limited Power of Attorney. Client hereby grants Attorneys a limited power of attorney to execute all documents and papers that Client would execute relating to the subject matter of the claim or cause of action.

Co-Counsel: Attorney is authorized to associate and employ other counsel to assist in representing Client, at no additional expense to Client.

No Guarantee as to Result: Client acknowledges that Attorney has made no guarantee as to the outcome or amounts recoverable in connection with Client's claim.

Medical Liens. Client agrees that Attorneys may take all steps deemed advisable for the resolution of any medical insurer (including Medicare/Medicaid and private insurers), disability insurer, and/or workers' compensation liens, including hiring separate experts/case workers who assist with resolving such reimbursement claims or liens. The expense of any such service shall be treated as a case expense and deducted from client's net recovery and shall not be paid out of Attorneys' contingent fee.

Appeal. Attorneys have the sole right to accept or reject any appeal.

Death. If Client dies before the claim covered by this Agreement is resolved, this Agreement is binding on and shall inure to the benefit of the Client's heirs, death beneficiaries, and the personal representative of the Client's estate. If it is necessary to retain probate counsel, expenses for such counsel shall be borne by Client.



Client Signature: _____

Print Client Name: _____

Date: _____

Oscar De la Rosa, Esq.

De la Rosa Law, P.A.

Attorney Signature: _____

Date: _____

Exhibit C-1

Ferrer Poirot Wansbrough Claimant List

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit C-1 – Ferrer Poirot Wansbrough - Redacted Claimant Schedule

Page 1 of 3

EXHIBIT C-1		FERRER POIROT WANSBROUGH		REDACTED VERSION	
First Name (Injured Person)	Last Name (Injured Person)	Date of Birth	SSN (last 4)	Date of Death (if applicable)	Claim Type (disease)
Darlene	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cristina	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Vernester	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Julia	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
JoAnne	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Debra	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Susan	A.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Janine	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Edith	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carol	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Suzette	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Lisa	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Janet	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Gertrude	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Germayna	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Joyce	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Marsha	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Dottie	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Betty	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Julianne	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Jeanine	B.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Traumonique	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Angela	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Lisa	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Linda	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Harriet	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Antoinette	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Rhonda	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Margaret	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Frances	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Rhonda	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
LaTiffany	C.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sheila	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
June	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Becky	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Maria	D.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Zina	E.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Thelma	E.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ada	E.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit C-1 – Ferrer Poirot Wansbrough - Redacted Claimant Schedule

Page 2 of 3

First Name (Injured Person)	Last Name (Injured Person)	Date of Birth	SSN (last 4)	Date of Death (if applicable)	Claim Type (disease)
Joyce	E.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Pamela	E.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Deborah	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carolyn	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Lynda	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Odessa	F.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Proserfina	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Therese	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Monike	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sonnie	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Andrea	G.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cecelia	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Joannn	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Linda	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Margaret	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Jo Ann	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Darlene	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Tessa	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Amber	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Shanika	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Margaret	H.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cynthia	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sandra	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Valda	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Aldean	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mary	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Fiata	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Vernia	J.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Bonnie	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Glenda	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Brenda	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mary	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ruby	L.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Anita	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Carolyn	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Robin	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Claudette	M.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Paula	N.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Margaret	N.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Jeannine	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

First Supplemental Verified Rule 2019 Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins Rubio LLP

Exhibit C-1 – Ferrer Poirot Wansbrough - Redacted Claimant Schedule

Page 3 of 3

First Name (Injured Person)	Last Name (Injured Person)	Date of Birth	SSN (last 4)	Date of Death (if applicable)	Claim Type (disease)
Maria	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Patricia	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Evangelia	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Siesia	P.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sheila	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Shirley	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Janet	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ava	R.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mary	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Paulette	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Barbara	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Roxanna	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Mary	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Barbara	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sharon	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Judy	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Ellen	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Keri	S.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Faillelei	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Dorisa	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Loretta	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Vallena	T.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Cynthia	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Helen	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Sharon	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Dorothy	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Margaret	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Karen	W.	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Exhibit C-2

Ferrer Poirot Wansbrough Retainer Agreement

ATTORNEY RETAINER AGREEMENT

This contract is between Ferrer Poirot Feller & Daniel, hereby referred to as "FPFD", ("Attorney") and _____, Client(s) of (City, State) _____, to represent him/her for damages arising out of a personal injury claim, in connection with Talcum Powder against whosoever may be liable for same; and whereas FPFD agrees to represent Client; it is agreed as follows:

- 5) FPFD agrees to represent Client in their cause of action for personal injuries to settlement or final judgment of Client's claims against any and all parties responsible for damages, subject to paragraphs 9, 10, 14, and 15 below.
- a. Client agrees to pay, to FPFD, as compensation for Attorney's services, _____ of all **gross** recoveries from and against all sources, persons, or entities whether actually tried before a judge or jury, appealed or settled. The percentage referenced in this paragraph will be calculated on and subtracted from the **gross** amount of any recovery obtained before deducting any expenses, incurred by our, or a co-counsel, firm. Depending on the structure of the settlement, if any, attorneys' fees may be paid by lump sum or in periodic payments through an assignment company at no additional charge to Client. All parties to this contract agree and understand that the nature of this contingency fee agreement, in conjunction with any co-counsel attorneys, is a "shared risk-type" of fee. It is NOT a "referral fee." If any dispute arises about the reasonableness or necessity of the attorney's fees, in a state that it is alleged that "referral fees" are not allowed, all parties to this contract hereby waive any claim or defense that this agreement constitutes a "referral fee."
 - b. **JOINT REPRESENTATION** - Our law firm may prosecute your case with another law firm we select to assist us in handling this matter. If so, this will not affect the total amount of attorney's fees that will be deducted from your gross recoveries. Our firm will assume joint responsibility for your representation, and the division of the attorney's fees, between our firm, and the co-counsel attorney(s) will be based upon that joint representation. Client hereby consents to one or more of the following lawyers or law firms by whom you will be represented, and who will participate in the fee-sharing agreement, and the percentages, of the total fee deducted from your recovery, if any, that each firm will receive upon successful completion of the case.
 - c. Client understands that FPFD and its co-counsel attorneys shall advance court costs as well as case-specific expenses and pro rata share of general case expenses and assessments. These expenses will be deducted from the settlement recovery after deduction is made for attorney's fees, outlined in paragraph 5a and b above. **If there is no recovery, Client WILL NOT be responsible for any of these expenses or attorney's fees.**

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- 10) Client hereby transfers and assigns to FPF and/or its co-counsel attorneys an undivided interest in Client's claims. The undivided interest hereby assigned to FPF and/or its co-counsel attorneys, by Client, is equivalent to the fees, costs, and expenses, including the percentage of any recovery as defined in paragraphs 5 a, b, c (1), (2), (3) and (4) above, and/or any ADDENDUM hereto that Client, by this agreement, promises to pay to Attorney, if a monetary recovery is obtained for client's claims. The undivided interest assigned by this agreement is a present, not an executory, interest.
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I HAVE READ AND FULLY UNDERSTAND THE ABOVE CONTRACT

SIGNED AND EXECUTED ON _____ .

JOE POIROT on behalf of
FERRER POIROT FELLER DANIEL

Signature of Client

Please return Contract to:
FERRER, POIROT & WANSBROUGH
2603 OAK LAWN AVENUE, SUITE 300
PO BOX 199109
DALLAS, TX 75219-9109

Print Client Name Here

For any questions, please contact us at:
(800) 521-4492
info@lawyerworks.com

Print Name of Injured Party Here

"PROTECTING VICTIMS' RIGHTS SINCE 1981"

Exhibit D

Additional Member Acknowledgements

ACKNOWLEDGEMENT

I hereby represent that the information provided herein with respect to De la Rosa Law Firm is true and correct to the best of my knowledge.

DE LA ROSA LAW FIRM:

DocuSigned by:

By:

Oscar de la Rosa

Name: Oscar de la Rosa

Title: President

ACKNOWLEDGEMENT

I hereby represent that the information provided herein with respect to Ferrer Poirot & Wansbrough is true and correct to the best of my knowledge.

FERRER POIROT & WANSBROUGH:

DocuSigned by:

By: Jesse Ferrer

Name: Jesse Ferrer

Title: managing partner